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OCT - 5 2007

October 5, 2007

Via Facsimile to (212) 805-7912

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, Room 1030
New York, New York 10007

Re: Golub v. Trans Union LLC and Nationwide Recovery Systems, Inc.
07 CV 6308 (JGK) (ECF)

Dear Judge Koeltl:

We represent defendant Nationwide Recovery Systems, Inc. ("Nationwide") in the above-referenced action. We write, based on the circumstances set forth below, to respectfully request an enlargement of Nationwide's time to file a reply with respect to its pending motion to dismiss the complaint.

As the Court is aware, on or about August 24, 2007, Nationwide filed a motion to dismiss the complaint in this action. Plaintiff opposed the motion on or about September 21, 2007, and filed a cross-motion for leave to amend his complaint. We have informed plaintiff's counsel that Nationwide has no objection to plaintiff's cross-motion and that, pursuant to FRCP Rule 15(a), plaintiff may amend his complaint as of right. Nevertheless, plaintiff has not filed his amended complaint.

Nationwide's deadline for filing a reply with respect to its motion to dismiss the complaint is October 5, 2007. If plaintiff files his amended complaint, Nationwide's reply, and its motion to dismiss the existing complaint, will be moot. We respectfully suggest that it would be a waste of both the Court's and the parties' time and resources to require Nationwide to submit a reply under these circumstances.

Moreover, the other defendant in this case, Trans Union, evidently is planning to respond only to the proposed Amended Complaint, although it has not yet been filed. See Letter from Trans Union's counsel to the Court, dated October 3, 2007.

Accordingly, the current posture has the two defendants proceeding against two different complaints. We thus respectfully request that the Court enlarge Nationwide's time

1. On consent, the plaintiff shall file an amended complaint by October 19, 2007.
2. The defendant's time to respond is extended to November 9, 2007.
3. Nationwide's motion to dismiss the current complaint (Docket No. 7) is denied without prejudice as moot.
4. Plaintiff's motion to file an amended complaint (Docket No. 14) is granted on consent.
SO ORDERED
J.G. Koeltl
U.S.D.S.
10/5/07

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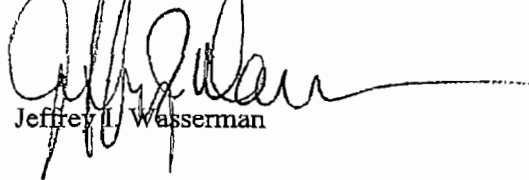
to reply until plaintiff either (1) files his amended complaint, which will moot the pending motion to dismiss, or (2) the Court denies plaintiff's cross-motion to amend; in such case, Nationwide would request ten days from such denial to submit reply papers on its motion to dismiss. We understand that Plaintiff's counsel is out of the office, and thus we were not able to obtain his position on this request.

In the alternative, we respectfully request an enlargement of time from October 5, 2007 to October 17, 2007 to serve and file Nationwide's reply papers in support of its motion to dismiss. Plaintiff has consented to such an extension, and a stipulation to that effect is enclosed herewith.¹

Thank you for your consideration of this matter.

Respectfully submitted,

Bracewell & Giuliani LLP



Jeffrey L. Wasserman

cc: Timothy P. Creech, Esq.
Nehemiah S. Glanc, Esq.

¹ Nationwide has not previously requested an extension regarding its reply papers. However, plaintiff's counsel had requested, and Nationwide stipulated to, an extension of his time to oppose the motion to dismiss. The stipulation scheduled Nationwide's time to reply as October 5, 2007.

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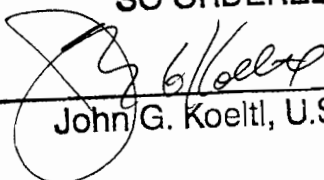
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October 5, 2007

BY FACSIMILE (212) 791-0630

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, New York 10007

APPLICATION GRANTED
SO ORDERED

10/5/07

John G. Koeltl, U.S.D.J.

Re: United States v. Lynne Stewart,
02 Cr. 395 (JGK)

Dear Judge Koeltl:

This letter is respectfully submitted on behalf of Lynne Stewart, who this firm represents in the above-titled case. As the Court will recall, Ms. Stewart is presently permitted to travel only within the Southern, Eastern and Northern Districts of New York. She respectfully requests permission to travel to the judicial district discussed below. AUSA Anthony Barkow has been informed of this request and opposes it.

Ms. Stewart's itinerary is as follows:

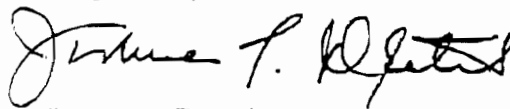
- October 8: Washington, D.C. – to pick up her brother-in-law and return with him to New York, for eye surgery on October 9, 2007.
- November 1-3: Washington, D.C., in order to attend the National Lawyer's Guild Convention. She will be staying with a friend, Elizabeth Du Mez, on Upland Avenue in Arlington, VA.

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The Honorable John G. Koeltl
United States District Court
Southern District of New York
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The government, through AUSA Anthony Barkow, has been contacted regarding this request and opposes it. Probation will be provided with contact information for Ms. Stewart's lodging as soon as it is available.

Respectfully submitted,



Joshua L. Dratel

JLD/msh

cc: AUSA Anthony Barkow
(by fax (212) 637-0097)

Dawn Doino, Senior U.S. Probation Officer
(by fax (212) 805-0047)

All Defense Counsel
(by Electronic Mail)